

In support of this motion, Plaintiffs state the following:

1. Plaintiffs brought this action on behalf of themselves and the proposed class defined above to seek relief for Defendant's failure to honor its agreements with borrowers to modify mortgages and prevent foreclosures under the U.S. Treasury's Home Affordable Modification Program ("HAMP").

2. As demonstrated in the supporting memorandum of law, the proposed class meets the requirements of Rules 23(a) and 23(b)(2).

3. In addition to the memorandum, Plaintiffs rely on the following documents submitted herewith in support of this motion:

a. Declaration of Gary Klein in Support of Plaintiffs' Motion for Class Certification;

b. Declaration of Charles Delbaum in Support of Plaintiffs' Motions for Class Certification and Preliminary Injunction;

WHEREFORE, Plaintiffs respectfully request that the Court grant their motion for provisional class certification and certify the proposed class for the purposes of preliminary injunctive relief.

Dated: September 7, 2010

Respectfully Submitted,

Patricia Johnson, Fausto Cabrera, Vellyn Antonelli,
Carmen Fox, Mark Angelopoulos, Diane Anderson,
and James and Margaret Cooley individually and on
behalf of all others similarly situated,

By their attorneys,

/s/ Charles Delbaum

Stuart Rossman (BBO 430640)

Charles Delbaum (BBO 543225)

NATIONAL CONSUMER LAW CENTER
7 Winthrop Square, 4th floor
Boston, MA 02110
Tel: (617) 542-8010
Fax: (617) 542-8028

Gary Klein (BBO 560769)
Shennan Kavanagh (BBO 655174)
Kevin Costello (BBO 669100)
RODDY KLEIN & RYAN
727 Atlantic Avenue
Boston, MA 02111-2810
Tel: (617) 357-5500
Fax: (617) 357-5030

Michael Raabe (BBO 546107)
NEIGHBORHOOD LEGAL SERVICES
170 Common Street, Suite 300
Lawrence, MA 01840
Tel: (978) 686-6900
Fax: (978) 685-2933

Dated: September 7, 2010

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF) and paper copies will be sent to those indicated as non-registered participants on the date of filing.

/s/ Charles M. Delbaum
Charles M. Delbam